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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LANCE DOWNES-COVINGTON, an individual, SOLDADERA SANCHEZ, an individual, ROBERT O'BRIEN, an individual, EMILY DRISCOLL, an individual, ALISON KENADY, an individual, TENISHA MARTIN, an individual, GABRIELA MOLINA, an individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT, in its official capacity; LIEUTENANT KURT MCKENZIE, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER TABATHA DICKSON, as an individual and in her capacity as a Las Vegas Metropolitan Police Department Officer; CAPTAIN PATRICIA SPENCER, as an individual and in her capacity as a Las Vegas Metropolitan Police Department Officer; CAPTAIN DORI KOREN, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; EVAN SPOON, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; JORDAN TURNER, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; UNKNOWN OFFICERS 1-14, as individuals and in their capacity as Las Vegas Metropolitan Police Department Officers,

Defendants.

Case. No.: 2:20-cv-01790-CDS-DJA

STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN
AND SCHEDULING ORDER
DEADLINES

(SEVENTEENTH REQUEST)

1 **STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND**
 2 **SCHEDULING ORDER DEADLINES (SIXTEENTH REQUEST)**

3 Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily
 4 Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through
 5 their attorneys of record, Margaret A. McLetchie, Esq. and Leo S. Wolpert, Esq. with the
 6 law firm of McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department
 7 (the "Department" or "LVMPD"), Lieutenant Kurt McKenzie ("McKenzie"), Officer
 8 Tabatha Dickson ("Dickson"), Captain Patricia Spencer ("Spencer"), Captain Dori Koren
 9 ("Koren"), Officer Evan Spoon ("Spoon"), and Officer Jordan Turner ("Turner"),
 10 collectively ("LVMPD Defendants"), by and through their attorneys of record, Craig R.
 11 Anderson, Esq., with the law firm of Marquis Aurbach, hereby stipulate and agree to extend
 12 the Discovery Plan and Scheduling Order deadlines an additional sixty (60) days. This
 13 Stipulation is being entered in good faith and not for purposes of delay (supplemented
 14 information noted in **bold-face** type).

15 I. **STATUS OF DISCOVERY.**

16 A. **PLAINTIFFS' DISCOVERY.**

- 17 1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP
 18 26.1(a)(1) dated January 20, 2021;
- 19 2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
 20 Interrogatories dated May 13, 2021;
- 21 3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Interrogatories
 22 dated May 13, 2021;
- 23 4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Interrogatories
 24 dated May 13, 2021;
- 25 5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Interrogatories dated
 26 May 13, 2021;
- 27 6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Interrogatories dated
 28 May 13, 2021;

1 7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Interrogatories dated
2 May 13, 2021;

3 8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Interrogatories
4 dated May 13, 2021;

5 9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Requests
6 for Production of Documents dated May 13, 2021;

7 10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests for
8 Production of Documents dated May 13, 2021;

9 11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for
10 Production of Documents dated May 13, 2021;

11 12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for
12 Production of Documents dated May 13, 2021;

13 13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for
14 Production of Documents dated May 13, 2021;

15 14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for
16 Production of Documents dated May 13, 2021;

17 15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests for
18 Production of Documents dated May 13, 2021;

19 16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD dated
20 June 2, 2021;

21 17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD dated
22 June 2, 2021;

23 18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July 1, 2021;

24 19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and Documents
25 Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;

26 20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and Documents
27 Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;

1 21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and Documents
2 Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;

3 22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of
4 Interrogatories dated July 8, 2021;

5 23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of
6 Interrogatories dated July 8, 2021;

7 24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of
8 Interrogatories dated July 8, 2021;

9 25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of
10 Interrogatories dated July 8, 2021;

11 26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of
12 Interrogatories dated June 8, 2021;

13 27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of
14 Requests for Production of Documents dated July 8, 2021;

15 28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of
16 Requests for Production of Documents dated July 8, 2021;

17 29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of
18 Requests for Production of Documents dated July 8, 2021;

19 30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of
20 Requests for Production of Documents dated July 8, 2021;

21 31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of
22 Requests for Production of Documents dated July 8, 2021;

23 32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
24 Requests for Production of Documents dated July 8, 2021;

25 33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's First Set
26 of Requests for Production of Documents dated July 12, 2021;

27 34. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First
28 Set of Requests for Production of Documents dated July 12, 2021;

1 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
2 Interrogatories dated July 12, 2021;

3 36. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First
4 Set of Interrogatories dated July 12, 2021;

5 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July 13,
6 2021;

7 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD dated
8 July 13, 2021;

9 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated July 14,
10 2021;

11 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD dated
12 July 14, 2021;

13 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and Documents
14 Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

15 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated September
16 15, 2021;

17 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD dated
18 September 15, 2021;

19 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September 17,
20 2021;

21 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
22 dated December 16, 2021;

23 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
24 dated December 16, 2021;

25 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
26 dated December 16, 2021;

27 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
28 Interrogatories dated December 16, 2021;

1 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
2 dated December 16, 2021;

3 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
4 dated December 16, 2021;

5 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
6 dated December 16, 2021;

7 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for Admissions
8 dated December 16, 2021;

9 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for Admissions
10 dated December 16, 2021;

11 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for Admissions
12 dated December 16, 2021;

13 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests for
14 Admissions dated December 16, 2021;

15 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for Admissions
16 dated December 16, 2021;

17 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for Admissions
18 dated December 16, 2021;

19 58. Alison Kenady's Responses to LVMPD's First Set of Requests for Admissions
20 dated December 16, 2021;

21 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

22 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1, 2022;

23 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1, 2022;

24 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated April
25 1, 2022;

26 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD dated
27 April 1, 2022;

28 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1, 2022;

1 65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April 1, 2022;
 2 66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;
 3 67. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
 4 Lombardo [Request Nos. 1-5] dated June 17, 2022;
 5 68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha Dickson
 6 dated June 17, 2022;
 7 69. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
 8 Lombardo [Request Nos. 1-4] dated June 17, 2022;
 9 70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 17, 2022;
 10 71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17, 2022;
 11 72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17, 2022;
 12 73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 17,
 13 2022;
 14 74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated
 15 June 17, 2022;
 16 75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17, 2022;
 17 76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17, 2022;
 18 77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson
 19 dated June 17, 2022;
 20 78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 17,
 21 2022;
 22 79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June
 23 17, 2022;
 24 80. Plaintiffs' First Set of Requests for Production of Documents to Defendant Patricia
 25 Spencer dated June 17, 2022;
 26 81. Plaintiffs' First Set of Requests for Production of Documents to Defendant Dori
 27 Koren dated June 17, 2022;
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1 82. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
2 [Request No. 1] dated June 17, 2022;

3 83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie
4 dated June 17, 2022;

5 84. Tenisha Martin's First Set of Interrogatories to Lt. Kurk McKenzie dated June 17,
6 2022;

7 85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21, 2022;

8 86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated
9 June 21, 2022;

10 87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21, 2022;

11 88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 21,
12 2022;

13 89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21, 2022;

14 90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June
15 21, 2022;

16 91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 21,
17 2022;

18 92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 21, 2022;

19 93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson dated
20 June 21, 2022;

21 94. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
22 [Request Nos. 1-5] dated June 21, 2022;

23 95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie
24 dated June 21, 2022;

25 96. Plaintiffs' First Set of Requests for Production of Documents to Officer Tabatha
26 Dickson dated June 21, 2022;

27 97. Plaintiffs' First Set of Requests for Production of Documents to Patricia Spencer
28 dated June 21, 2022;

1 98. Plaintiffs' First Set of Requests for Production of Documents to Captain Dori Koren
2 dated June 21, 2022;

3 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson
4 dated June 21, 2022;

5 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated
6 June 21, 2022;

7 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21,
8 2022;

9 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One
10 dated October 27, 2022.

11 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated
12 October 27, 2022.

13 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One
14 dated October 27, 2022.

15 105. Plaintiff Emily Driscoll's Requests for Production of Documents to
16 LVMPD - Set One dated October 27, 2022.

17 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
18 Dickson - Set One dated October 27, 2022.

19 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson - Set
20 One dated October 27, 2022.

21 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
22 October 27, 2022.

23 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One
24 dated October 27, 2022.

25 110. Plaintiff Gabriela Molina's Requests for Production of Documents to
26 LVMPD - Set One dated October 27, 2022.

27 111. Plaintiff Gabriela Molina's Requests for Production of Documents to
28 Tabatha Dickson - Set One dated October 27, 2022.

1 112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One
2 dated October 27, 2022.

3 113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson -
4 Set One dated October 27, 2022.

5 114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four
6 dated October 27, 2022.

7 115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson -
8 Set Two dated October 27, 2022.

9 116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set
10 One dated October 27, 2022.

11 117. Plaintiff Lance Downes-Covington's Requests for Production of Documents
12 to LVMPD - Set One dated October 27, 2022.

13 118. Plaintiff Lance Downes-Covington's Requests for Production of Documents
14 to Tabatha Dickson - Set One dated October 27, 2022.

15 119. Plaintiff Lance Downes-Covington's Requests for Production of Documents
16 to Jordan Turner - Set One dated October 27, 2022.

17 120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD
18 - Set One dated October 27, 2022.

19 121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha
20 Dickson - Set One dated October 27, 2022.

21 122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan
22 Turner - Set One dated October 27, 2022.

23 123. Soldadera Sanchez's Requests for Production of Documents to LVMPD -
24 Set One dated November 7, 2022.

25 124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated
26 November 7, 2022.

27 125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7,
28 2022.

1 126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set
2 One dated November 7, 2022.

3 127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated
4 November 7, 2022.

5 128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7,
6 2022.

7 129. Alison Kenady's Requests for Production of Documents to LVMPD - Set
8 One dated November 7, 2022.

9 130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated
10 November 7, 2022.

11 131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
12 One dated November 7, 2022.

13 132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated
14 November 7, 2022.

15 133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and
16 Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

17 134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and
18 Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

19 135. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
20 Two, dated January 17, 2023.

21 136. Tenisha Martin's Requests for Production of Documents to LVMPD – Set
22 Three, dated April 18, 2023.

23 137. Plaintiff Lance Downes-Covington's Requests for Production to LVMPD -
24 Set Two dated May 16, 2023.

25 138. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set Two
26 dated June 14, 2023.

27 139. Plaintiffs' Eighth Supplemental Disclosure of Witnesses and Documents
28 Pursuant to FRCP 26.1(a)(1) dated January 30, 2024.

1 140. Plaintiffs' Ninth Supplemental Disclosure of Witnesses and Documents
2 Pursuant to FRCP 26.1(a)(1) dated February 27, 2024.

3 141. Plaintiffs' Tenth Supplemental Disclosure of Witnesses and Documents
4 Pursuant to FRCP 26.1(a)(1) dated April 18, 2024.

5 **142. Plaintiffs' Initial Designation of Expert Witness Pursuant to FRCP**
6 **26(a)(2) dated September 16, 2024.**

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8 **B. DEFENDANTS' DISCOVERY.**

9 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents Pursuant to
10 FRCP 26.1(a)(1) dated January 20, 2021.

11 2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington dated
12 March 12, 2021.

13 3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated March
14 12, 2021.

15 4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated March 12,
16 2021.

17 5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated March 12,
18 2021.

19 6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated March 12,
20 2021.

21 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated March 12,
22 2021.

23 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated March 12,
24 2021.

25 9. LVMPD's First Set of Request for Production of Documents to Plaintiff Lance
26 Downes-Covington dated March 12, 2021.

1 10. LVMPD's First Set of Request for Production of Documents to Plaintiff Soldadera
 2 Sanchez dated March 12, 2021.

3 11. LVMPD's First Set of Request for Production of Documents to Plaintiff Robert
 4 O'Brien dated March 12, 2021.

5 12. LVMPD's First Set of Request for Production of Documents to Plaintiff Emily
 6 Driscoll dated March 12, 2021.

7 13. LVMPD's First Set of Request for Production of Documents to Plaintiff Alison
 8 Kenady dated March 12, 2021.

9 14. LVMPD's First Set of Request for Production of Documents to Plaintiff Tenisha
 10 Martin dated March 12, 2021.

11 15. LVMPD's First Set of Request for Production of Documents to Plaintiff Gabriela
 12 Molina dated March 12, 2021.

13 16. LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses and
 14 Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

15 17. LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
 16 Interrogatories dated July 20, 2021.

17 18. LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
 18 Documents dated July 20, 2021.

19 19. LVMPD's Responses to Plaintiff Emily Driscoll's First Set of Interrogatories dated
 20 August 3, 2021.

21 20. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
 22 of Interrogatories dated August 3, 2021.

23 21. LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
 24 Production of Documents dated August 3, 2021.

25 22. LVMPD Defendants' Second Supplement to Initial Disclosures of Witnesses and
 26 Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

27 23. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
 28 of Interrogatories dated August 9, 2021.

24. LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

25. LVMPD's Responses to Plaintiff Tenisha Martin's First Set of Interrogatories dated August 16, 2021.

26. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
dated August 16, 2021.

27. LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of Documents dated August 16, 2021.

28. LVMPD's Responses to Plaintiffs' Second Set of Requests for Production of Documents dated August 30, 2021.

29. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
dated August 30, 2021.

30. LVMPD Defendants' Fourth Supplement to Initial Disclosures of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

31. LVMPD Defendants' Privilege Log dated August 30, 2021.
32. LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for Production

of Documents dated September 13, 2021.

33. LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for

Production of Documents dated September 13, 2021.

Interrogatories dated September 13, 2021.

Interrogatories dated September 13, 2021.

dated September 22, 2021.

September 22, 2021.

1 38. Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
 2 September 22, 2021.

3 39. Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
 4 September 22, 2021.

5 40. Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
 6 September 22, 2021.

7 41. Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
 8 September 22, 2021.

9 42. Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina dated
 10 September 22, 2021.

11 43. LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
 12 Covington dated September 22, 2021.

13 44. LVMPD's First Set of Requests for Admission to Plaintiff Soldadera Sanchez dated
 14 September 22, 2021.

15 45. LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien dated
 16 September 22, 2021.

17 46. LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll dated
 18 September 22, 2021.

19 47. LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady dated
 20 September 22, 2021.

21 48. LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin dated
 22 September 22, 2021.

23 49. LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina dated
 24 September 22, 2021.

25 50. LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses and
 26 Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.

27 51. LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production of
 28 Documents dated October 18, 2021.

1 52. LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of Interrogatories
 2 dated October 18, 2021.

3 53. LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated October
 4 20, 2021.

5 54. LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
 6 Interrogatories dated May 5, 2022.

7 55. LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories dated
 8 May 5, 2022.

9 56. LVMPD's Answers to Plaintiff Robert O'Brien's First Set of Interrogatories dated
 10 May 5, 2022.

11 57. LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories dated
 12 May 5, 2022.

13 58. LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
 14 Documents dated May 5, 2022.

15 59. LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of Interrogatories
 16 dated May 5, 2022.

17 60. LVMPD's Answers to Plaintiff Gabriella Molina's First Set of Interrogatories dated
 18 May 5, 2022.

19 61. LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions dated
 20 May 5, 2022.

21 62. LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-Covington's
 22 First Set of Interrogatories dated June 24, 2022.

23 63. LVMPD's First Supplemental Responses to Plaintiffs' Second Set of Requests for
 24 Production of Documents dated June 24, 2022.

25 64. LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's Second Set of
 26 Interrogatories dated June 24, 2022.

27 65. LVMPD's Second Supplemental Responses to Plaintiffs' First Set of Requests for
 28 Production of Documents dated June 24, 2022.

1 66. Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of Interrogatories
 2 dated August 8, 2022.

3 67. Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of Interrogatories dated
 4 August 8, 2022.

5 68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for Production
 6 of Documents dated August 8, 2022.

7 69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for Production of
 8 Documents dated August 8, 2022.

9 70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Admissions
 10 dated August 8, 2022.

11 71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of
 12 Interrogatories dated August 8, 2022.

13 72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions dated
 14 August 8, 2022.

15 73. LVMPD's Answers to Lance Downes-Covington's Third Set of Interrogatories
 16 dated August 8, 2022.

17 74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories dated
 18 August 8, 2022.

19 75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for Production
 20 of Documents dated August 8, 2022.

21 76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Production of
 22 Documents dated August 8, 2022.

23 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories dated August
 24 8, 2022.

25 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated August
 26 8, 2022.

27 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
 28 Documents dated August 8, 2022.

1 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated August
 2 8, 2022.

3 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated August 8,
 4 2022.

5 82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated
 6 December 6, 2022.

7 83. Jordan Turner's Responses to Lance Downes-Covington's Requests for Production
 8 – Set One, dated December 6, 2022.

9 84. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission
 10 – Set One, dated December 6, 2022.

11 85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories – Set
 12 One, dated December 6, 2022.

13 86. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission
 14 – Set One, dated December 6, 2022.

15 87. Jordan Turner's Responses to Gabriela Molina's Requests for Production – Set
 16 One, dated December 6, 2022.

17 88. Tabatha Dickson's Reponses to Lance Downes Covington's Requests for
 18 Production – Set One, dated December 6, 2022.

19 89. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set
 20 One, dated December 6, 2022.

21 90. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set
 22 Two, dated December 6, 2022.

23 91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
 24 Admission – Set One, dated December 6, 2022.

25 92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
 26 Production – Set One, dated December 6, 2022.

27 93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated
 28 December 6, 2022.

1 94. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission – Set
2 One, dated December 6, 2022.

3 95. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated
4 December 6, 2022.

5 96. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production – Set
6 One, dated December 6, 2022.

7 97. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission – Set
8 One, dated December 6, 2022.

9 98. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories – Set One, dated
10 December 6, 2022.

11 99. LVMPD'S Responses to Lance Downes Covington's Requests for Production – Set
12 One, dated December 6, 2022.

13 100. LVMPD'S Responses to Lance Downes Covington's Requests for
14 Admission – Set One, dated December 6, 2022.

15 101. LVMPD'S Responses to Lance Downes Covington's Interrogatories – Set
16 Four, dated December 6, 2022.

17 102. LVMPD's Responses to Emily Driscolls' Interrogatories – Set One, dated
18 December 6, 2022.

19 103. LVMPD's Responses to Emily Driscolls' Interrogatories – Set Four, dated
20 December 6, 2022.

21 104. LVMPD's Responses to Emily Driscolls' Requests for Admission – Set
22 One, dated December 6, 2022.

23 105. LVMPD's Responses to Emily Driscolls' Requests for Production – Set
24 One, dated December 6, 2022.

25 106. LVMPD's Responses to Gabriela Molina's Interrogatories – Set Two, dated
26 December 6, 2022.

27 107. LVMPD's Responses to Gabriela Molina's Requests for Production– Set
28 One, dated December 6, 2022.

1 108. LVMPD's Responses to Gabriela Molina's Requests for Admission – Set
2 One, dated December 6, 2022.

3 109. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated
4 December 16, 2022.

5 110. LVMPD'S Responses to Tenisha Martin's Requests for Admission – Set
6 One, dated December 19, 2022.

7 111. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission –
8 Set One, dated December 19, 2022.

9 112. LVMPD'S Responses to Robert O'Brien's Requests for Admission – Set
10 One, dated December 19, 2022.

11 113. LVMPD'S Responses to Alison Kenady's Requests for Admission – Set
12 One, dated December 19, 2022.

13 114. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set One, dated
14 December 19, 2022.

15 115. LVMPD'S Responses to Alison Kenady's Requests for Production – Set
16 One, dated December 20, 2022.

17 116. LVMPD'S Responses to Robert O'Brien's Requests for Production – Set
18 One, dated December 20, 2022.

19 117. LVMPD's Responses to Soldadera Sanchez' Requests for Production – Set
20 One, dated December 20, 2022.

21 118. LVMPD'S Responses to Tenisha Martin's Requests for Production – Set
22 One, dated December 20, 2022.

23 119. LVMPD'S Responses to Alison Kenady's Interrogatories – Set Two, dated
24 January 4, 2023.

25 120. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set Three,
26 dated January 4, 2023.

27 121. LVMPD'S Responses to Alison Kenady's Interrogatories - Set Two, dated
28 January 4, 2023.

1 122. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set Three,
 2 dated January 4, 2023.

3 123. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents
 4 Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

5 124. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First
 6 Set of Interrogatories, dated February 16, 2023.

7 125. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's
 8 Second Set of Interrogatories, dated February 16, 2023.

9 126. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of
 10 Requests for Production of Documents, dated February 16, 2023.

11 127. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of
 12 Requests for Production of Documents, dated February 16, 2023.

13 128. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of
 14 Requests for Production of Documents, dated February 16, 2023.

15 129. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production
 16 of Documents - Set One [sic Set Two], dated February 16, 2023.

17 130. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents
 18 Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

19 131. LVMPD's Responses to Tenisha Martin's Requests for Production of
 20 Documents - Set Three dated May 22, 2023.

21 132. LVMPD's Responses to Gabriela Molina's Requests for Admissions - Set
 22 Two dated July 17, 2023.

23 133. LVMPD's Responses to Lance Downes-Covington's Requests for
 24 Production of Documents - Set Two dated July 17, 2023.

25 134. LVMPD's Eleventh Supplemental Disclosure of Witnesses and Documents
 26 Pursuant to FRCP 26.1(a)(1), dated July 17, 2023.

27 135. LVMPD's Twelfth Supplemental Disclosure of Witnesses and Documents
 28 Pursuant to FRCP 26.1(a)(1), dated April 24, 2024.

1 **136. LVMPD's Initial Designation of Expert Witness Pursuant to FRCP**
2 **26(a)(2) dated September 17, 2024.**

3
4 **C. DEPOSITIONS.**

- 5 1. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.
6 2. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10, 2022.
7 3. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.
8 4. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.
9 5. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on August 19,
10 2022.
11 6. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20, 2022.
12 7. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.
13 8. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.
14 9. Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.
15 10. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on November 15,
16 2022.
17 11. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.
18 12. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.
19 13. LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24, 2023.
20 14. Plaintiffs deposed LVMPD Defendants' FRCP 30(b)(6) designee(s) - Lt. Landon
21 Reyes on June 20, 2023.
22 15. Plaintiffs' Deposition Subpoena to Las Vegas Justice Court per FRCP 30(b)(6) for
23 records related to Defendants' citations and arrests during the 2020 BLM Protests.
24 16. Plaintiffs' Deposition Subpoena to Las Vegas Municipal Court per FRCP 30(b)(6)
25 for records related to Defendants' citations and arrests during the 2020 BLM Protests.
26 17. Plaintiffs deposed Defendants' FRCP 30(b)(6) designee(s) (Dori Koren) on April
27 26, 2024.

1 **18. Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee(s) (John
2 McGrath) in November or December 2024.**

3 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

4 The Parties are actively conducting discovery and have completed the majority of
5 the written discovery and depositions. However, the Parties are continuing to meet and confer
6 on outstanding discovery issues.

7 The Parties' primary remaining discovery tasks include: (1) Plaintiffs have
8 subpoenaed records from the Las Vegas Municipal Court and Las Vegas Justice Court for
9 documents concerning Defendant's misdemeanor citations and arrests during the BLM
10 Protests in 2020 and are in the process of obtaining records related to the same; (2) resolution
11 of meet and confer issues and motion practice if needed; (3) Plaintiffs' deposition of
12 Defendant Las Vegas Metropolitan Police Department's FRCP 30(b)(6) designee John
13 McGrath; (4) expert rebuttal reports; and (5) depositions of the experts.

14 Defendants need to depose Plaintiff's expert.

15 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

16 This is the **seventeenth** request for an extension of discovery deadlines in this
17 matter. The Parties request that the Discovery Plan and Scheduling Order deadlines be
18 extended an additional sixty (60) days so that the Parties may complete the tasks above and
19 efficiently manage expert disclosures. **This involves waiting for deposition transcripts
20 requiring expert review and analysis and Defendants need to supplement their
21 production of Bates stamped documents.**

22 The Parties acknowledge that, pursuant to local Rule 26-3, the Parties must
23 establish that good cause exists to extend the deadlines.

24 The Parties have been diligently conducting discovery and continue to conduct
25 discovery, but an extension is still needed to efficiently conclude discovery and manage the
26 case.

27 Additionally, the parties are continuing to meet and confer with Defendants'
28 counsel regarding the FRCP 30(b)(6) deposition and subpoenas. Meet and confer efforts are

1 ongoing. Likewise, the experts retained in this matter will also need to review the recent
 2 discovery responses, Defendants' supplemental responses (if any), information and
 3 documents in response to Plaintiffs' subpoenas to Justice Court and Municipal Court, BWC
 4 videos, and all deposition transcripts, including the two FRCP 30(b)(6) designees—Dori
 5 Koren and John McGrath. While Dori Koren was deposed on April 26, 2024, the deposition
 6 transcript is currently pending. Counsel are conferring to schedule a deposition date for John
 7 McGrath for November or December 2024 due to the schedule conflicts of counsel and the
 8 designees. This deposition will occur after the current deadline for rebuttal expert
 9 disclosures. The Parties are working with their respective experts to prepare their rebuttal
 10 expert disclosures. However, as noted, the Parties contend that it is more efficient to allow
 11 further discovery to be completed before rebuttal expert disclosures to minimize the need for
 12 supplementation.

13 Counsel for Plaintiffs have been required to spend time out of the office (and/or out
 14 of the jurisdiction) in May, June and July to attend to family obligations. Mr. Wolpert's
 15 father—who lived out of the jurisdiction in Tucson, Arizona—passed away from
 16 complications related to amyotrophic lateral sclerosis (ALS) on May 17, 2024, requiring Mr.
 17 Wolpert to assist with funeral arrangements and generally assist his widowed mother in
 18 Tucson in May and June. Ms. McLetchie's mother—whom Ms. McLetchie had been
 19 assisting with care for Stage IV cancer—passed away on July 28, 2024, requiring Ms.
 20 McLetchie to assist with funeral arrangements and attending to her late mother's affairs and
 21 estate. Furthermore, Pieter O'Leary, a senior attorney at McLetchie Law, left the firm
 22 effective May 3, 2024, requiring Ms. McLetchie and Mr. Wolpert to devote additional
 23 attention to matters in which Mr. O'Leary was lead counsel.

24 **In August, September, and October 2024, counsel for Plaintiffs were again
 25 required to spend time out of the office (and/or out of the jurisdiction) to fulfill family
 26 obligations. Specifically, Ms. McLetchie was required to continue attending to her late
 27 mother's affairs and estate, including preparing and hosting a memorial service.**
 28

1 **Additionally, rebuttal experts need additional time to evaluate the initial expert reports
2 and draft their rebuttals.**

3 **Defendants request an extension due to the primary attorney handling the case
4 unexpectedly left MAC in August 2024. Therefore, the undersigned has been required
5 to get up to speed on this case (and numerous others). This brief extension will allow
6 for defense counsel to familiarize himself with the case and remaining discovery.**

7 The Parties thus respectfully request an extension of time to enable them to conduct
8 necessary discovery and so that this matter is fairly resolved on the merits. “Good cause to
9 extend a discovery deadline exists ‘if it cannot reasonably be met despite the diligence of the
10 party seeking the extension.’” *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013
11 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (*quoting Johnson*
12 *v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); see also Fed. R. Civ. P. 1
13 (providing that the Rules of Civil Procedure “should be construed, administered, and
14 employed by the court and the Parties to secure the just, speedy, and inexpensive
15 determination of every action and proceeding”). As the procedural history of this case
16 illustrates, the Parties have been diligent in litigating this matter. Significant written
17 discovery has been exchanged, nearly all depositions are complete, experts are engaged, and
18 counsel continue to meet and confer regarding various topics. Additionally, counsel for the
19 Parties in this matter are litigating several other unrelated matters (including against each
20 other) which have competing demands. While competing demands of litigation are merely
21 one of many reasons for the instant request, it should be noted that the other litigation
22 between the same counsel involving similar issues can only benefit from the completion of
23 discovery in this matter so that in other litigation, similar requests can be expedited and can
24 further the resolution of those matters and the interests of justice. Indeed, counsel for the
25 Parties continue to engage in settlement discussions regarding this and the other matters they
26 are litigating that stem from the BLM protests.

27 Thus, the standards to extend all deadlines, including the expert deadlines, is satisfied here.
28

1 Based on the foregoing stipulation and proposed deadlines, the Parties thus
 2 respectfully request an extension of time to extend the deadlines in this matter to enable to
 3 them to conduct necessary discovery and so that this matter is fairly resolved on the merits.

4 **IV. PROPOSED SCHEDULE FOR REMAINING DEADLINES**

Event	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	June 14, 2022	Past/Unchanged
Initial Expert Disclosures	September 16, 2024	Past/Unchanged
Rebuttal Expert Disclosures	October 21, 2024	December 20, 2024
Discovery Cut-Off	November 11, 2024	January 10, 2025
Dispositive Motions	January 3, 2025	March 4, 2025
Pretrial Order	January 16, 2025	March 17, 2025 (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

15 Based on the foregoing stipulation and proposed deadlines plan, the Parties request
 16 that the Discovery Plan and Scheduling Order deadlines be extended an additional sixty (60)
 17 days so that the Parties may conduct additional discovery, depose expert witnesses, and
 18 efficiently manage rebuttal expert disclosures.

20 Dated this 23rd day of October, 2024.

21 Dated this 23rd day of October, 2024.

22 MCLETCHIE LAW

23 MARQUIS AURBACH

24 By: /s/ Leo S. Wolpert

25 Margaret A. McLetchie, Esq.
 Nevada Bar No. 10931
 26 Leo S. Wolpert, Esq.
 Nevada Bar No. 12658
 27 602 South 10th Street
 Las Vegas, Nevada 89101
 28 Attorneys for Plaintiffs

24 By: /s/ Craig R. Anderson

25 Craig R. Anderson, Esq.
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 26 10001 Park Run Drive
 Las Vegas, Nevada 89145
 27 Attorney for Defendants Las Vegas
 Metropolitan Police Department,
 Lieutenant Kurt McKenzie, Officer
 Tabatha Dickson, Captain Patricia
 Spencer, Captain Dori Koren, Officer

Evan Spoon and Officer Jordan Turner

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

UNITED STATES MAGISTRATE JUDGE

DATEED 10/24/2024

DATED: _____